

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**RAMONA THURMAN BIVINS,** )

**Plaintiff,** )

**v.** )

**CIVIL ACTION**

**NO: 1:22-cv-04149-WMR**

**FELICIA FRANKLIN, in her** )  
**individual and official capacities;** )

**ALIEKA ANDERSON, in her** )  
**individual and official capacities;** )

**GAIL HAMBRICK, in her** )  
**individual and official capacities;** )

**and CLAYTON COUNTY,** )  
**GEORGIA** )

**Defendants.** )

**DEFENDANTS GAIL HAMBRICK AND CLAYTON COUNTY,  
GEORGIA’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT**

COME NOW Defendants Gail Hamrick, in her individual and official capacities (“Commissioner Hamrick” or Defendant Hamrick”), and Clayton County, Georgia, (“Clayton County” or “the County”) (collectively, “Defendants”), by and through counsel, and file this Motion to Dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6). The basis for the motion is set forth in the accompanying brief in support of the motion.

Respectfully submitted this 5<sup>th</sup> day of December, 2022.

**FREEMAN MATHIS & GARY, LLP**

*/s/ Kirsten S. Daughdril*

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), I hereby certify that the foregoing has been prepared in compliance with Local Rule 5.1(C) (Times New Roman font, 14-point).

This 5<sup>th</sup> day of December, 2022.

**FREEMAN MATHIS & GARY, LLP**

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**CERTIFICATE OF SERVICE**

I hereby certify that I have this day electronically submitted the foregoing  
**DEFENDANTS GAIL HAMBRICK AND CLAYTON COUNTY,**  
**GEORGIA'S MOTION TO DISMISS PLAINTIFF'S COMPLAINT** to the  
Clerk of Court using the CM/ECF system which will automatically send electronic  
mail notification of such filing to all counsel of record who are CM/ECF system  
participants.

This 5<sup>th</sup> day of December, 2022.

**FREEMAN MATHIS & GARY, LLP**

/s/ Kirsten S. Daughdril

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